final environmental statement

development concept plan june 1979

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# SEQUOIA AND KINGS CANYON

GIANT FOREST / LODGEPOLE

NATIONAL PARKS / CALIFORNIA

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## UNITED STATES DEPARTMENT OF THE INTERIOR

FES 79-58

FINAL ENVIRONMENTAL STATEMENT

PROPOSED

DEVELOPMENT CONCEPT PLAN

GIANT FOREST/LODGEPOLE AREA

SEQUOIA AND KINGS CANYON NATIONAL PARKS

Prepared by
Denver Service Center
National Park Service
Department of the Interior

Director, National Park Service



() Draft (X) Final Environmental Statement

Department of the Interior, National Park Service, Western Region

- 1. Type of action: (X) Administrative () Legislative
- Brief description of action: A development concept 2. plan for the Giant Forest/Lodgepole area of Sequoia and Kings Canyon National Parks includes the following major components: converting Giant Forest to a day use area; developing Clover Creek for visitor lodging and associated services, employee housing, and a new sewage treatment plant; developing the Wolverton Corrals area for day use parking and transportation staging; redesigning the campground and the employee community at Lodgepole: developing Red Fir for maintenance facilities and a sewage disposal spray field; providing a public transportation system linking the developed areas; removing the Wolverton Boy Scout camp and expanding the Dorst Creek campground for group camping.
- 3. <u>Summary of environmental impact and adverse</u> environmental effects:
  - a. Relocation of facilities out of Giant Forest and the interim upgrading of the sewage treatment system will improve both the aesthetic and ecological integrity of the giant sequoia groves.
  - b. Construction of facilities at Clover Creek and provision of access will impact a previously undeveloped area dominated by red fir. Impacts will involve removal of trees and tree loss as a result of soil compaction and interruption of hydrological patterns.
  - c. Construction of the parking structure at Wolverton Corrals will significantly alter the existing setting. Concentrations of automobiles will produce impacts such as air pollution and noise normally associated with an urban setting.
  - d. Continued vegetative loss associated with camping use at Lodgepole will necessitate restorative measures. Implementation of landscaping and other resource management techniques will halt and probably reverse these trends.
  - e. A total of approximately 115.5 acres for facilities and 42 acres for effluent disposal

will be affected by the proposal, compared to 130.5 acres presently developed. Approximately 72 acres presently developed will be retained; 85.5 undisturbed acres (including the 42-acre effluent disposal field) will be developed. Approximately 56 acres of development and 3 miles of roads will be removed and restored to natural conditions, primarily in the Giant Forest where removal of development will allow the natural regeneration of the Sequoia groves.

- Alternatives considered:
  - No action a.
  - Consolidation of functions at alternative sites b.
  - Dispersal of functions C.
  - Sewage treatment options
- 5. Comments have been requested from the following:

\*Advisory Council on Historic Preservation Department of Agriculture

\*Forest Service

Soil Conservation Service

Department of the Interior

\*Bureau of Land Management \*Bureau of Outdoor Recreation \*Fish and Wildlife Service

\*Geological Survey

\*Environmental Protection Agency \*California State Clearinghouse

\*California State Historic Preservation Officer

- \* Comments have been received and are attached.
- 6. Date Made Available to EPA and the Public:

Draft Statement: November 21, 1977

Final Statement: NOV 5 1979

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Public and agency review of the Draft Environmental Statement and Development Concept Plan for the Giant Forest/Lodgepole area of Sequoia and Kings Canyon National Parks did not lead to any changes in the proposals.

Technical corrections and some additional information developed during the review porcess and these additions are indicated on the following errata pages.

Chapter IX, Consultation and Coordination with others has been reprinted with the addition of an analysis of comments and the response to them.

A list of Planning Team members and Consultants was omitted from the draft statement and has been included with the errata sheets.

Since the changes in the document were minor, we have used the errata method to produce the Final Environmental Statement. This has resulted in significant savings in printing cost and is in compliance with Section 1503.4(c) of CEQ's November 1978 NEPA regulations.

#### ERRATA

Page 21 - Map - Lodgepole Proposal

"Provide Trailhead Parking" was omitted below the words "Remove Store."

Page 24 - Paragraph 3 - Add the following sentence to the end of the paragraph.

"Monitoring of potable water as well as stream quality will continue regardless of the water sources or source selected."

Page 39 - Add the following paragraph.

"The Department of Water Resources, State of California, coordinates the collection of snow data for the California Snow Surveys Program. The existing two sites located in the study area will not be disturbed by the proposals. Access for maintenance and snow measurement, as provided for in the existing special use permit, will continue to be allowed."

Page 41 - Table - Transit System

Under Existing Column remove "None" and add "Concessioner operated tour (2 hours) twice a day from mid-May to mid-September."

Page 49 - Map - Giant Forest Central Area

Change "Concessions Management Area" to "Concessions Maintenance Area."

Page 72 - Add the following sentence to the end of the first paragraph.

"Further evaluation of slope stability/landslide potential in the Lodgepole area will be conducted during comprehensive design stages."

Page 113 - Insert the following paragraph between the first and second paragraphs.

As designated by the 1977 Clean Air Act Ammendments, Sequoia and Kings Canyon National Parks are designated Class I areas. Under the Prevention of Significant Deterioration provisions the air quality within the park, and due to park activities, is prohibited from decreasing below the lowest allowable increments of degradation. Air pollutants affected by these provisions include particulate matter and sulfur dioxide with maximum allowable increments not permitted to exceed ambient levels by 10 and 5 micrograms per cubic meter, respectively, over a 24 hour maximum.

Page 152 - Add the following sentence at the end of the last paragraph.

"The stated water use requirements do not take into consideration water conservation measures which will be included in the new facilities."

Page 166 - Replace the last paragraph with the following:

Local generation of air pollutants will be changed by the proposed transportation system. Levels of carbon monoxides, hydrocarbons, nitrogen oxides, and particulate matter generated by local day use traffic will initially decrease as a result of use of the transportation systems (one carrying overnight visitors to the staging area, and the second as an interpretive tram through Giant Forest). If day use increases over the next 10 years, however, pollution may return to or exceed present levels. However, increased percentage of use of emission control devices may offset the effect of increased numbers of vehicles.

Pollution from vehicular traffic associated with camping, housing, and maintenance will continue in the Giant Forest/Lodgepole area, but will be reduced in Giant Forest and redistributed to Lodgepole, Clover Creek, and Red Fir.

Amounts of carbon monoxide produced within the parking structure are estimated to be 4.59 kilograms per day; assuming a turnover of 1700 cars - three times per day - average idling time of 5 minutes.

Environmental Protection Agency emission rates for light weight vehicles between model years 1975-1980 at an emission rate of .18 grams per minute were utilized. Worst case conditions would assume no dispersion of exhaust pollutants and, therefore, the indicated concentrations would be far in excess of both California and National air quality standards.

Page 169 - Add the following to paragraph three.

"Increased day-use of the park will have a potential impact on adjoining communities. Increased numbers of day-users will most likely increase the demand on local services, primarily overnight accommodations and food service facilities. The increased demand, if not met by existing developments, will probably result in an increase in private development of accommodation types and food services resulting eventually in increased economic benefits. Additional development of recreational opportunities on Forest Service or Bureau of Reclamation lands outside Sequoia and Kings Canyon National Park will have similar effects."

Page 170 - Paragraph three. Change the last sentence to read:

"For the more passive visitors, the shuttle trip could embody their Giant Forest experience, but the shuttle will provide the opportunity to walk through the Forest to another stop without having to retrace the route to return to their cars. The shuttle would probably have little effect on the overall experience of active visitors, as their primary contact with the Giant Forest will be on hiking trails."

Page 171 - Add the following sentences to paragraph four.

"The parking facility will provide a secure area for some back-country users to park their vehicles, reducing concern for vandalism. Some backcountry users may find the shuttle schedule inconvenient, particularly those wishing to leave or those returning during the hours the system is not operating."

Page 175 - Add the following sentence to the first paragraph.

"Further evaluation of slope stability/landslide potential in the Lodgepole area will be conducted during comprehensive design stages."

Page 176 - Paragraph four - add the following sentence at the end of the paragraph.

"Early morning and late evening runs of the tram will allow visitors to experience the Giant Forest at these less congested hours and will provide additional service for backcountry users."

Page 177 - Paragraph three - add a comma after vegetation and add the following phrase.

", and ground and surface water."

Page 177 - Replace last paragraph with the following.

"The California State Historic Preservation Officer and the Advisory Council on Historic Preservation have been consulted and a Memorandum of Agreement has been signed (see Section IX C.2). All proposals in the plan are in compliance with 36 CFR 800. The Stipulations contained in the Memorandum of Agreement are considered a part of the proposal and will satisfactorily mitigate any adverse effect on the cultural resources."

Page 184 - Add the following paragraph prior to A. Alternative 1.

"Numerous alternatives and variations on alternatives were considered during the planning process. An earlier version of the development concept was presented to the public 1974 and some components met with much criticism. In 1975, public workshops were held to discuss alternatives for those components of the plan which had been criticized, primarily the location and number of campsites and the character of the relocated concessioner development. The alternatives discussed here summarize the range of feasible alternatives considered."

Page 247 - Add the following to the seventh item in the table (following Sunset Campground).

Column 1 (Existing)

"SENTINEL TREE AREA "Retain/upgrade existing facilities"
Food, store, parking"

Page 259 - Chapter IX - Consultation and Coordination with Others -

The entire section is reprinted with the addition of an analysis of agency and public comments and responses to them.

#### D. PLANNING TEAM AND CONSULTANTS

PLANNING TEAM
Denver Service Center
Douglas Cornell, Architect/Planner, Team Coordinator
Frank Ziegenfus, Park Planner, Team Captain
John Ochsner, Landscape Architect
Jan Bergquist, Environmental Specialist
Joan Trent, Environmental Specialist
Robert Schiller, Environmental Specialist
Kurt Johnson, Environmental Specialist
Clem Diessner, Engineer
Jean Swearingen, Interpretive Planner
Leslie Hart, Cultural Resources Specialist
Berle Clemensen, Historian

Sequoia and Kings Canyon National Parks Stanley T. Albright, Former Superintendent David D. Thompson, Jr., Superintendent

#### CONSULTANTS

Denver Service Center Richard Johnson, Economist Kenneth Hornback, Sociologist Lebrun Hutchison, Engineer

Sequoia and Kings Canyon National Parks
Gene Daugherty, Former Assistant Superintendent
John Palmer, Chief Naturalist
George Briggs, Resources Management
Kenneth Bachmeyer, Chief of Park Maintenance
Linda Lewin, Public Affairs
Hank Schmidt, Former Superintendent

Other National Park Service Offices Keith Anderson and staff, Southwest Archaeological Center Bill Tweed, Historian, Western Regional Office

Other Federal Agencies
Dr. James Smith, U.S. Department of Agriculture, Forest Service
John Leasure and staff, Sequoia National Forest

Private Organizations and Individuals
Sasaki and Walker Associates
Theodore Osmundson and Associates
Tudor Engineering Company
Chip Caulum, Concession Manager, Sequoia and Kings Canyon National Parks
The many participants in the planning workshops

#### IX. Consultation and Coordination with Others

A. Consultation and Coordination in the Development of the Proposal and in the Preparation of the Draft Environmental Statement

### 1. Planning

Several previous planning efforts for Sequoia and Kings Canyon National Parks provide direction to the current development concept plan for Giant Forest/Lodgepole. Resource preservation and improved interpretive experiences for visitors were established as paramount goals for the study area in a master plan for both parks (approved 1971). The master plan confirmed the appropriateness of visitor lodging in the study area and proposed definite lodging ceilings for the area.

Early work in the study area produced a preliminary plan that was publicly reviewed on August 8, 1974 (Visalia, California), August 9, 1974 (Fresno, California), and August 10, 1974 (Ash Mountain, California). Public input indicated acceptance of proposals for the removal of major development from prime resource areas within Giant Forest. The use of transportation systems to minimize private vehicular traffic and as access to Giant Forest for interpretive means was also widely accepted. However, questions were raised about the location, type, and number of campsites provided in the study area and the location, character, and distribution of concession facilities.

January 10-12 and 15, 1975: Consultation with the staff of Sequoia and Kings Canyon National Parks and the Denver Service Center planning team members. Discussion concerned alternatives that would have an impact. It was agreed that there would be additional public involvement, including workshops and press releases. Assumptions to be reflected in each of the alternatives derived during the planning process would include the following:

Concession accommodations and campgrounds would provide an opportunity to remain overnight in the Giant Forest/ Lodgepole area.

Experiences associated with sequoias and the High Sierra environment would be the primary objectives and should be reflected in each of the alternatives.

Major developed areas within the study area's sequoia groves would be inconsistent with the major experience objectives and should be phased out.

January 13, 1975: Consultation among the Denver Service Center planning team, Sequoia and Kings Canyon staff, and U.S. Forest Service (Sequoia National Forest). Discussions concerned the interrelationships of Forest Service land and adjoining National Park Service lands. Specific areas potentially influenced by the

planning effort would include Mineral King, the Hume Lake District, and Stony Creek. An agreement was reached that separate but parallel planning efforts would be undertaken by both agencies and that idea sharing would take place at the staff levels.

January 14, 1975: Consultation among the Denver Service Center planning team, Sequoia and Kings Canyon staff, and concessioner operations officer. Discussions concerned general alternative plans and concluded that a concession management plan would resolve issues too detailed to be included in the development concept plan (for example, day-to-day operations and complementation of visitor services).

<u>January 16-17, 1975</u>: Consultation among Tudor Engineering Company, Theodore Osmundson and Associates, and the Denver Service Center planning team. Sewage treatment and water availability alternatives and potential demands upon the systems were discussed. Visitor use options, such as recreational vehicle uses versus overnight lodge facility uses and potential impacts or conflicts, potential traffic congestion problems between alternative tram routes, and private vehicle use were discussed in detail.

June 23-July 2, 1975: Consultation among the Denver Service Center planning team, the Sequoia and Kings Canyon staff, U.S. Forest Service, and Theodore Osmundson and Associates. Discussions concerned the format, responsibilities, and equipment needs for the forthcoming public workshops. Modification of materials to be presented at the public meetings were recommended by the Forest Service to include Forest Service lands adjacent to National Park Service lands. A potential joint monitoring program for sewage impacts was suggested. Agencies agreed to maintain communication as the development concept plan proceeded. Discussions also centered on a visitor use survey. Objectives, content, and format were discussed; detailed resolution of format and content were postponed until final approval by the Office of Management and Budget.

# 2. Natural Resources Consultation

Individuals who were contacted in person or by telephone during fall 1975:

Soil Scientists

Jeffrey Peters,
Osmundson and Associates
James T. Bayer, Kernville District,
Forest Service, U.S. Department
of Agriculture
Richard Huff, State Office,
Soil Conservation Service,
Sacramento, California

Hydrologist

Kenneth Schmidt, Groundwater Quality

Consultant, Fresno, California

### Plant Ecologists

Philip Rundel
University of California, Irvine
Thomas Harvey,
California State University,
San Jose
Dr. Sharsmith,
California State University,
San Jose
S.K. Stocking,
San Joaquin Delta College,
Stockton, California

#### Air Quality Specialists

Wayne Williams, Region 5
(San Francisco),
Forest Service, U.S. Department of Agriculture
Thomas Palmer, Experimental Station
(Riverside, California),
Forest Service,
U.S. Department of Agriculture

### 3. Socioeconomic Data Collection

# a. <u>Visitor Survey</u>

Visitor information was collected from August 15 through September 1, 1975. A mail-back questionnaire was utilized, with a follow-up questionnaire 1 week later. Survey packets were distributed to every fifth visitor vehicle exiting at Ash Mountain and Grant Grove during the sampling hours. In addition, survey packets were distributed to parties using bus transportation. The survey packets contained one Survey I, which asked general party information, and several Survey II's, which asked questions about information that was expected to vary from person to person. Every person over 12 years old in the designated party was asked to complete Survey II.

A total of 1,246 parties were stopped; 95 percent of these parties agreed to complete the questionnaire. Of the 1,192 questionnaire packets distributed, 740 were returned (62 percent). Ninety-three percent of the questionnaires received contained usable returns, and the analysis was performed on 685 Survey I's and 1,320 Survey II's.

The following consultants for the Yosemite carrying-capacity study were asked to review the survey:

Dr. Lee Ruggels Stanford Research Institute Palo Alto, California

Dr. George Stankey
Forest Service Laboratory
Forest Service
U.S. Department of Agriculture
Missoula, Montana

Dr. Robert Lee College of Natural Resources University of California Berkeley, California

Dr. Ervin Zube Institute for Man and Environment University of Massachusetts Amherst, Massachusetts

### b. Public Workshops

Public workshops were held on July 2 and July 16, 1975, at Lodgepole campground; July 8, 1975, at Visalia, California; and July 9, 1975, at Fresno, California. A total of 82 persons participated in these workshops, with 40 percent returning workbooks expressing their preferences for the Giant Forest/Lodgepole area. Presentations were made to six service clubs, and members were invited to complete workbooks. These service clubs were Exeter Lions Club (July 3), Visalia Rotary Club (July 23), Friends of the Earth (July 24), Woodland Rotary Club (July 20), Visalia Lions Club (August 13), and Reedley Lions Club (September 9). A summary of major ideas and concerns expressed at the public workshops is contained in a memo from the park superintendent dated October 7, 1975, on file at the Denver Service Center, Western Regional Office, and Sequoia National Park.

Dr. Everard Lofting of the Lawrence Berkeley Laboratory provided guidance on the analysis of regional economic impacts. This was done under a joint contract with Yosemite National Park initiated during November 1975.

### 4. Cultural Resources Consultation

The California state historic preservation officer was contacted in regard to historic properties in or adjacent to the Giant Forest/Lodgepole study area. He made recommendations to the National Park Service concerning National Register eligibility of several pending nominations. He also suggested that the General Sherman Tree, General Grant Tree, and the Fallen Monarch be nominated to the Natural Landmark program. A consultation on the proposal to remove structures in the potential historic districts in Giant Forest was held in June 1977, resulting in minor modifications which are reflected in this document. An on-site consultation and the prepara-

tion of a Preliminary Case Report were completed in the summer of 1977. Further comments by the State Historic Preservation Officer and the Advisory Council on Historic Preservation, including evidence of compliance with 36 CFR 800, has been included in the final environmental statement (See Appendix D).

#### 

Copies of the draft environmental statement were sent to the following for review:

### Federal Agencies

Advisory Council on Historic Preservation
Department of Agriculture
Forest Service
Soil Conservation Service
Department of the Interior
Bureau of Land Management
Bureau of Outdoor Recreation
Fish and Wildlife Service
Geological Survey
Environmental Protection Agency

### State Agencies

California State Clearinghouse California State Historic Preservation Officer

Information copies were sent to the following:

California Department of Fish and Game California Department of Parks and Recreation California Division of Forestry California Native Plant Society California Water Quality Control Board Council of Fresno County Governments Fresno County Board of Supervisors Friends of the Earth General Services Incorporated, Manager Inyo County Board of Supervisors Inyo County Chamber of Commerce National Parks and Conservation Association Nature Conservancy Sierra Club Sierra Land Use Committee

Southern California Edison Company Tulare County Board of Supervisors Tulare County Chamber of Commerce Tulare County Planning Commission Walt Disney Productions, Chairman Wilderness Society

Copies were also sent to additional private individuals identified by the park staff.

# C. <u>Consideration of Public Review in the Preparation of the Final Environmental Statement</u>

# 1. Summary of Public Comments

The development concept plan and its draft environmental statement were made available for public review from November 21, 1977 to March 6, 1978. This unusually long review period was considered necessary because of the intervening holiday season. Public meetings were held in Fresno, California on February 1, 1978, and Visalia, California on February 2, 1978. Approximately 48 persons attended the Fresno meeting and 60 attended in Visalia. Most individuals favored the concepts in the plan but were concerned about specific design and operations details. Several individuals stated that the range of alternatives considered were too limited. It was explained that a wider range of alternatives were presented during public workshops and that the draft environmental statement only addressed alternatives which were representative of the range of alternatives explored and were feasible to implement.

Transcripts of the public meetings and an analysis of all comments are available at the park headquarters. A number of individuals were representing organizations and also sent in written comments. Their letters are reproduced later in this chapter.

The major area of concern related to details of the proposed transit system and parking structure. The following comments are typical of the concerns expressed during the public meetings:

"What hours will the shuttle run? Will there be a charge for the transit system? Would GSI and Greyhound bus tours still be allowed? Would you have to listen to an interpretive program if you just wanted to get to Crescent Meadow to backpack? The tram stinks in Yosemite? There would be more flexibility to hike in the grove because of the transit system. Will there be a place for backpacks on the trams? What happens to hikers who arrive or depart from Crescent Meadow when the system is not operating? Is the parking structure really needed?

In response, it was stated that details of the transit systems and parking structure will be developed during a transportation study which will be initiated after the conceptual plan is approved. The size of the parking structure was based on a theoretical capacity of the highway system serving the area and more information

will be needed to determine how many spaces would be constructed in each phase. It may turn out that there will be adequate parking at other areas (Clover Creek, Lodgepole, Wolverton) in the initial phase and a separate parking structure would not be required. Transit system schedules and design features would take into consideration the special needs of backpackers, handicapped, and the elderly. There appears to be no reason private bus tours could not continue and should, in fact, be encouraged if that would reduce the number of cars entering the area. The details of an interpretive program also require further study--a public address system with continuous interpretive talks would not be used. If an interpretive talk is proven desirable, individual headsets would allow the visitor the choice of listening or just relaxing. The question of transit system fees is being studied but, generally, when the system is primarily for resource preservation rather than a "tour", no separate fees would be charged.

A second area of concern was the lack of additional campsites in the proposal and that the new lodging units would be unattractive and too costly. The following comments are typical of the concerns expressed:

"Will Sunset, Paradise and Sugar Pine campground be replaced? The public wants more campsites and picnic sites. Without recognizing this demand, it's not a very good plan. Will there be enough campgrounds surrounding this Park to handle all these people? It's nice to upgrade things but don't upgrade them too high so they can't be afforded by the average family. Only the standard lodging units (Type B) would be of any possible interest to us, and then only if they were individual units. Explore the possibility of taking care of more people in the lodge-like facilities. Any increase in demand for overnight facilities should be accommodated outside the Park."

In response, it was stated that the Master Plan (now called General Management Plan) for Sequoia and Kings Canyon National Parks set ceilings on overnight lodging and campground units. The number of lodging units proposed at Clover Creek are in compliance with that ceiling. The plan states that there will be a variety of lodging types at varied price ranges and the facilities will be designed to provide a character similar to the existing Giant Forest development. A study of the Giant Forest-Lodgepole road corridor for possible campground locations did not reveal any sites suitable for an economically viable development. The need for water and sewage treatment systems and general management expenses preclude scattered, individual campsites. The total number of campsites within the two parks is below the established ceiling and locations for additional campgrounds will be studied as planning progresses in other areas.

The balance of the comments and questions concerned such things as the relationship of this planning effort to Mineral King and other areas, how realistic were the cost estimates, and details on the water and sewage systems and ski area improvements. There were comments that the ski area should be removed and that the money should be spent to develop Mineral King.

While the purpose of a public meeting is to hear comments in a formal manner and is not to arrive at a concensus, an informal show of hands indicated that only three out of approximately 108 persons attending the two meetings disapproved of the plan. There were many reservations about specific actions in the proposal, but the basic concepts, designed to assure preservation of the Giant Forest Sequoia grove, met with approval.

#### 2. Written Comments and Responses

A total of 39 letters were received during the 60-day review period. Comments were received from 10 federal agencies, 2 state agencies, 6 organizations and local government agencies, and 11 individuals. All letters received are printed in the comment and response section of this document. Review comments indicating errors in information or providing additional data have been checked for validity and changes incorporated where appropriate in the text.

The comments and responses for each letter are numbered in consecutive order and responses immediately follow each letter. Since similar questions were posed by several reviewers the first time a question is posed, it is fully answered. From then on, responses to similar questions are referred back to the first answer. To facilitate this referral system, the letters are organized by category and placed in alphabetical order within each category as follows:

Federal Agencies State Agencies Organizations and Local Government Agencies Individuals

Responses follow those letters with comments needing specific response.

#### a. Comments by Federal Agencies

Comments were received from the following

agencies:

Advisory Council on Historic Preservation
Department of Agriculture
Forest Service
Department of the Interior
Bureau of Indian Affairs
Bureau of Land Management (2)
Bureau of Mines
Bureau of Reclamation
Fish and Wildlife Service
Geological Survey
Heritage Conservation and Recreation Service
Environmental Protection Agency

Advisory Council on Historic Preservation 1522 K Street N.W. Washington, D.C. 20005

August 28, .1978

Mr. Howard H. Chapman Regional Director, Western Region National Park Service 450 Golden Gate Avenue, Box 36063 San Francisco, California 94102

Dear Mr. Chapman:

The Memorandum of Agreement for the removal of overnight facilities at Sequoia National Park, California, has been approved by the Chairman of the Council. This document constitutes the comments of the Council as required by Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f, as amended, 90 Stat. 1320) and completes the "Procedures for the Protection of Historic and Cultural Properties" (36 CFR Part 800). A copy of the Agreement is enclosed.

A copy of this Memorandum of Agreement should be included in any environmental assessment or statement prepared for this undertaking in compliance with the National Environmental Policy Act and should be retained in your records as evidence of compliance with Section 106 of the National Historic Preservation Act of 1966. The Council appreciates your cooperation in reaching a satisfactory solution to the issues raised in this matter.

Sincerely yours,

Myra F. Harrison Assistant Director Office of Review and Compliance

Enclosure

#### SEE APPENDIX D FOR MEMORANDUM OF AGREEMENT

The Council is an independent unit of the Executive Branch of the Federal Government charged by the Act of October 15, 1966 to advise the President and Congress in the field of Historic Preservation.



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### UNITED STATES DEPARTMENT OF AGRICULTURE FOREST SERVICE 630 Sansome Street

San Francisco, California 94111

SUPT AS AO MA CMS RB CPI CEN 1990 CP1978 Marich

Mr. David D. Thompson, Jr. Superintendent Sequoia and Kings Canyon National Parks Ash Mountain Three Rivers, California 93271

Dear Mr. Thompson:

We have reviewed your draft environmental statement on the Development Concept Plan, Giant Forest/Lodgepole Areas in Sequoia and Kings Canyon National Parks (DES 77-36).

Since facility capacity will remain virtually the same and since use is being shifted within a relatively small area, we anticipate little impact on use patterns within the Sequoia National Forest. Park visitors unable to find accommodations in the Park will continue to use Stony Creek Campground, Stony Creek Resort, etc., in the National Forest. Our only concern is that by maintaining present Park capacity over the long term, visitor pressure on National Forest land is increased at a faster rate than projected growth in demand for outdoor recreation.

Please send us a copy of the final environmental statement when released.

Sincerely,

∢ DOUGLAS R. LEISZ Regional Forester

6200-11 (1/69)

Advisory Council on Historic Preservation 1522 K Street N.W. Washington, D.C. 20005

#### MEMORANDUM OF AGREEMENT

WHEREAS, the National Park Service proposes to remove overnight facilities in Sequoia National Park, California, that adversely affect internationally significant natural values for the preservation of which Congress established the park; and,

WHEREAS, the National Park Service, in consultation with the California State Historic Preservation Officer, has determined that this undertaking as proposed would have an adverse effect upon the Giant Forest Lodge Historic District, the Giant Forest Village, and the Camp Kaweah Historic District, properties included in the National Register of Historic Places; and,

WHEREAS, pursuant to Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f, as amended, 90 Stat. 1320) and Section 2(b) of Executive Order 11593, the National Park Service has requested the comments of the Advisory Council on Historic Preservation; and,

WHEREAS, pursuant to the procedures of the Advisory Council on Historic Preservation (36 CFR Part 800), representatives of the Advisory Council on Historic Preservation, the National Park Service, and the California State Historic Preservation Officer have consulted and reviewed the undertaking to consider feasible and prudent alternatives to avoid or satisfactorily mitigate the adverse effect; now,

#### THEREFORE:

It is mutually agreed that implementation of the undertaking, in accordance with the following stipulations, will satisfactorily mitigate any adverse effect on the above-mentioned properties:

#### Stipulations

1. Prior to demolition, the National Park Service will consult with the Historic American Buildings Survey (HABS), Heritage Conservation and Recreation Service, and the California State Historic Preservation Officer to develop and implement a program to record the Giant Forest Village, and Camp Kaweah Historic District to standards established by the Historic American Buildings Survey. The recordation program may include, but not necessarily limited to, a written history, record photographs, and measured drawings.

The Council is an independent unit of the Executive Branch of the Federal Government charged by the Act of

Page Two Memorandum of Agreement Removal of Overnight Facilities Sequoia National Park, California

> Copies of the documentation resulting from the recordation program will be filed with HABS, the Archives of the State of California, and with the California State Historic Preservation Officer;

- 2. Suitable architectural features and hardware from the cafeteria will be salvaged for reuse in restoration of the Giant Forest Market;
- The Giant Forest Market will remain in situ and will be adaptively restored as a visitor contact station. The comfort station and the District Ranger's Residence will remain in situ and continue to be used for those purposes;
- 4. Beetle Rock, an element of the significance of the Camp Kaweah Historic District, will not be altered by the proposed undertaking; and,
- 5. Upon completion of demolition in each historic district, the National Park Service will notify the Keeper of the National Register, in writing, in order that it can be removed from the National Register.

Coler In Atte (date) 7/12/78

Deputy Executive Director Advisory Council on Historic Preservation

National Park Service 7/25/78'

California State Historic Preservation

Officer

Out 110 Junille (date) 8/21/78

Advisory Council on Historic Preservation

# Response to Comments by United States Department of Agriculture - Forest Service

1. The Forest Service and National Park Service share the problems of increased demand for outdoor recreation. Development concept planning for the Grant Grove section of the park will address the need for additional campsites. The area from Stony Creek to Ash Mountain was studied during this current planning effort and no suitable sites for additional campgrounds were located. The Forest Service was consulted during this planning effort and will continue to be consulted during future planning efforts to assure that mutual problems are addressed.

IN REPLY REFER TO: "



UNITED STATES

DEPARTMENT OF THE INTERIOR

Land Operations

BUREAU OF INDIAN AFFAIRS

Sacramento Area Office
2800 Cottage Way

Sacramento, California 95825

JAN 13 1978

David D. Thompson, Jr., Superintendent Sequoia and Kings Canyon National Parks Ash Mountain Three Rivers, California 93271

Dear Mr. Thompson:

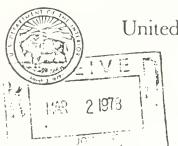
We have reviewed your draft environmental statement for the Proposed Development Concept Plan for the Giant Forest/Lodge-pole Area of Sequoia and Kings Canyon Nation Parks (DES 77/36), and found no Indian lands under the jurisdiction of this office are involved.

Sincerely yours,

Area Director



1793 (INT) (C-911.4.5)



# United States Department of the Interior

BUREAU OF LAND MANAGEMENT

STATE OFFICE
Federal Office Building
2800 Cottage Way
Sacramento, California 95825

February 27,1978

#### Memorandum

To:

Superintendent, Sequoia and Kings Canyon National Parks,

Ash Mountain, Three Rivers, California

From:

State Director, California

Subject:

Draft Environmental Statement for the proposed Development

Concept Plan for the Giant Forest/Lodgepole Area of Sequoia and

Kings Canyon National Parks, California (ER-77/36)

No public lands or programs will be affected by the proposed action.

we have no comments.

Ed Hanter

cc: DM, Bakersfield Director (260)



Save Energy and You Serve America!

IN REPLY REFER TO



# United States Department of the Interior

1791 (C-1950)

BUREAU OF LAND MANAGEMENT
800 Truxtun Avenue, Room 311
Bakersfield, California 93301
Phone: (805) 861-4191
Office hours: 7:30 a.m. to 4:00 p.m. weekdays

David D. Thompson, Jr., Superintendent Sequoia and Kings Canyon National Parks Ash Mountain Three Rivers, CA 93271

JAN 27 1978

Dear Mr. Thompson:

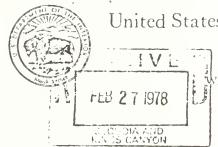
We have reviewed your Draft Development Concept Plan and Draft Environmental Statement for the Giant Forest/Lodgepole area and have no comments. It looks like a good job! Thanks for the opportunity to review these documents.

Sincerely yours

Youis A. Boll District Manager



OFFICE OF THE DIRECTOR



United States Department of the Interior

BUREAU OF MINES
2401 E STREET, NW.
WASHINGTON, D.C. 20241

February 13, 1978

Memorandum

To: Superintendent, National Park Service, Three Rivers, California

Through: Assistant Secretary-Energy and Minerals

From: Director, Bureau of Mines

Subject: Review of draft environmental statement Development Concept Plan for Sequoia and Kings Canyon National Parks, California

Thank you for the opportunity to review your draft environmental statement covering the development concept for the Giant Forest/Lodgepole area of Sequoia and Kings Canyon National Parks. We have no comments other than to compliment you on your planning.

Meter director





# United States Department of the Interior

BURFAU OF RECLAMATION WASHINGTON, D.C. 20240

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FEB 1873

JAN 26 1978

Mr. David D. Thompson, Jr.
Superintendent
Sequoia and Kings Canyon
National Parks
Ash Mountain
Three Rivers, California 93271

Dear Mr. Thompson:

As requested in your letter of December 8, 1977, we have reviewed the Draft Environmental Statement, Development Concept Plan for the Giant Forest/Lodgepole area of Sequoia and Kings Canyon National Parks, California (DES 77-36). We have no comments to offer on the subject statement.

Sincerely yours,

Assistant Commissioner

cc: Director, National Park Service, Washington, D.C.
Regional Director, Western Regional Office,
National Park Service, San Francisco, California



### United States Department of the Interior

#### FISH AND WILDLIFE SERVICE

DIVISION OF ECOLOGICAL SERVICES 2800 Cottage Way, Room E-2727 Sacramento, California 95825

February 24, 1978

Supervisor Sequoia National Forest P.O. Box 391 (900 W. Grand Ave.) Porterville, California 93257

Dear Sir:

We have reviewed the Draft Environmental Statement and Draft Development Concept Plan for the Giant Forest/Lodgepole area of Sequoia and Kings Canyon National Parks. We believe it adequately describes and covers the resources of the area and our concerns to protect those resources.

Sincerely,

Felix E. Smith
Field Supervisor

STT TIA NE 1 6 1978 cc: AM, Sacramento E AND 2734 []  $\Pi$ D RES.... AFOVL DC3A RECP. B KYD. D RAY\_ D RAD\_ [] SHOP COMSERVE AMERICA'S

Save Energy and You Serve America!



## United States Department of the Interior

GEOLOGICAL SURVEY RESTON, VIRGINIA 22092

In Reply Refer To: EGS-DES-77/36 Hail Stop 760



FEB 2 3 1978

Memorandum

To:

Superintendent, Sequoia and Kings Canyon National Parks,

National Park Service Three Rivers, California

Amy Secretary-Energy and Minerals

Acting Director, Geological Survey From:

Subject: Review of draft environmental statement for development con-

cept plan, Giant Forest/Lodgepole area, Sequoia and Kings

Canyon National Parks, California

We have reviewed the subject draft environmental statement as requested in your letter of December 8.

The statement is fairly adequate with regard to most ground-water impacts. However, it should provide for the issuance of a supplement, if wells are eventually used as sources of water supply as suggested on page 24.

The statement should include mention of monitoring of the quality of potable water supplies as delivered--especially if the alternative of the use of ground-water supplies should be implemented.

At least general specifications as to exfiltration and infiltration should be given for the proposed gravity sewer lines (e.g., p. 15, 46); this would be especially important if wells should be used as a source of water supply.

Ground water should be monitored downgradient from the spray irrigation facilities for disposal of sewage effluent.

for Acting Director

# Response to Comments by Geological Survey

- 1. A supplement would be issued if proposed water studies indicate a significant change in water sources and subsequent environmental impacts.
- 2. In compliance with State of California requirements, Sequoia personnell conduct periodic sampling of all potable waters. Major systems are sampled for total coliform and fecal coliform at least twice per month. A chemical analysis is conducted on all new systems and once every three to five years on established systems. Turbidity and residual chlorine are tested daily. These testing procedures are also in compliance with the procedures and test frequency as proposed by the Environmental Protection Agency.
- 3. This information is not available at this time but will be developed in subsequent studies. Generally, National Park Service construction standards and current construction techniques assure minimum problems in this area.
- 4. The proposed monitoring of the Red Fir site will incorporate an evaluation of impacts on both surface and ground water quality, therefore, the section on Mitigating Measures (Section IV) is changed in the Final Environmental Statement to read "A monitoring study of the disposal field at Red Fir will determine effects on vegetation, and ground and surface waters." An Environmental Assessment will also be prepared prior to project implementation; including details of the final construction proposal and anticipated environmental impacts of both the wastewater treatment and potable water systems.



### UNITED STATES

# DEPARTMENT OF THE INTERIOR LIERITAGE CONSERVATION AND RECREATION SERVICE BUREAU-OF-OUTDOOR RECREATION

-PACIFIC SOUTHWEST REGIONAL OFFICE

BOX 36062

. . .

978

3450 GOLDEN GATE AVENUE SAN FRANCISCO, CALIFORNIA 94102

MAR 6 1978

Memorandum

To:

Superintendent, National Park Service, Sequoia and

Kings Canyon National Parks

From:

Regional Director

Subject:

Review of draft environmental statement for proposed Development Concept Plan for the Giant Forest/Lodgepole

area of Sequoia and Kings Canyon National Parks

(DES-77/86)

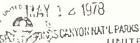
As requested in your letter of December 8, 1977, we have reviewed the subject statement. The draft statement appears to adequately address the probable impacts of this action. The proposed management objectives contained within the Development Concept Plan are sound and should heighten visitor satisfaction when implemented. We are pleased to see the strong emphasis placed upon the proposed transportation and interpretive programs, both of which would introduce visitors to the wide range of recreation activities available.

Frank E. Sylvasite

We appreciate the opportunity to review and comment on your statement.

cc: OEA, HCRS, WASO

RECEIVED



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGIONIX

215 Fremont Street San Francisco, Ca. 94105

D-NPS-K61020-CA

David D. Thompson, Jr. Superintendent Sequoia and Kings Canyon National Parks Ash Mountain, Three Rivers CA 93271

Dear Mr. Thompson:

MAY 1 0 1978

The Environmental Protection Agency has received and reviewed the draft environmental statement for the Development Concept Plan Giant Forest/Lodgepole Area Sequoia and Kings Canyon National Parks.

EPA's comments on the draft environmental statement have been classified as Category LO-2. Definitions of the categories are provided on the enclosure. The classification and the date of EPA's comments will be published in the Federal Register in accordance with our responsibility to inform the public of our views on proposed Federal actions under Section 309 of the Clean Air Act. Our procedure is to categorize our comments on both the environmental consequences of the proposed action and the adequacy of the environmental statement.

EPA appreciates the opportunity to comment on this draft environmental statement and requests three copies of the final environmental statement when available.

If you have any questions regarding our comments, please contact Betty Jankus, EIS Coordinator, at (415)556-6695.

Sincerely,

Paul De Falco, Jr.

Regional Administrator

Paul De Folis, A.

Enclosure

cc: Council on Environmental Quality

### Air Quality Comments

Both Sequoia and Kings Canyon National Parks are mandatory Federal Class I areas under the Prevention of Significant Deterioration (PSD) provisions of the 1977 Clean Air Act Amendments (CAAA). The Class I PSD designation of these areas and the PSD requirements of the 1977 CAAA should be discussed in the FEIS.

The FEIS should include a discussion of the existing ambier

The FEIS should include a discussion of the existing ambient levels of Total Suspended Particulates (TSP),  $SO_2$ , CO, and  $NO_{\rm X}$  using the most recent data available. The number of violations/yr. for each pollutant should also be included.

Since 70% of the yearly visits occur during the summer months, the table on "Estimated Vehicular Emissions in the Vicinity of the Giant Forest/Lodgepole Study Area" should be expanded to include estimates in tons/day of pollutants during the peak period June-September. The FEIS should then relate these peak month emissions to ambient concentrations.

A 1700 space parking facility partially constructed below ground level is likely to present a CO problem. A microscale CO analysis of the parking facility should be included in the FEIS.

The Wolverton ski area is planned to remain unchanged and the present 200-space parking area is designed to serve as a use constraint. What are the growth impacts associated with the proposed Wolverton corral parking facility? A shuttle bus from the parking facility to the ski area might result in visitor use exceeding the limitations of the ski area. This point needs to be addressed in the FEIS.

Will any of the alternatives result in increased National Ambient Air Quality Standards violations? Which alternative is the most environmentally favorable with respect to air quality?

The FEIS should include a discussion of possible mitigating measures designed to prevent significant deterioration of air quality.

#### EIS CATEGORY CODES

#### Environmental Impact of the Action

#### LO--Lack of Objections

EPA has no objection to the proposed action as described in the draft impact statement; or suggests only minor changes in the proposed action.

#### ER--Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

#### EU--Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

#### Adequacy of the Impact Statement

#### Category 1--Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

#### Category 2--Insufficient Information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

#### Category 3--Inadequate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft impact statement is assigned a Category 3, no rating will be made of the project or action, since a basis does not generally exist on which to make such a determination.

## Response to Comments by The Environmental Protection Agency

- 1. Subject discussion has been included in Section II.B.6, (Section on Air Quality in the Description of the Environment).
- 2. As noted in Section II.B.6., the San Joaquin Valley is the major source of contaminants within the park; activities within the park contribute relatively little to the air pollution problem. The only known air quality measurements occurring within the project area include monitoring of oxidants and as such has been previously discussed in Section II.B.6. The results of the monitoring indicated periods when Federal Standards were exceeded for about 12 percent of the total hours monitored. The only known data concerning total suspended particulates, SO2, CO, and NO $_{\rm X}$  are for areas outside the park and not directly applicable to the Giant Forest Lodgepole Area.
- 3. Subject table is a theoretical estimate of emissions produced on non-peak, peak, and maximum peak days. As such, all periods of visitation are represented. As previously stated, information relating to ambient concentrations is unknown. Additionally, concentration levels are significantly influenced by climatic conditions such as temperature inversions and wind factors. Unfortunately these data are lacking in sufficient detail and quantity for accurate estimates of concentration levels in the study area.

The need for a transportation study related to traffic flows, circulation patterns and a shuttle service has been previously commented on and is included in the Environmental Statement (Section I.B.2). As the final recommendations of the study are an essential part of the proposal, an air quality impact evaluation will be made at the completion of the study.

- 4. Detailed design studies of the proposed parking facility will be initiated following the completion of this present planning effort. Therefore, the degree of below ground construction, ventilation systems, and other design features are unknown. It is anticipated that engineering design will eliminate any potential for excessive carbon monoxide concentrations. However, as suggested, an evaluation of amounts of CO produced has been added to the Impact on Air Ouality (Section III.A.5). A comprehensive analysis of air quality impacts under both worst case conditions and design conditions will also be conducted following the completion of design features. A full review of impacts and design features will then be made available for review and comment.
- 5. The National Park Service does not propose to increase the capacity of the ski area. While available parking is a constraint, the slope and tow capacities are the limiting factor in the number of downhill skiers. The use of a shuttle system from the proposed parking structure could replace rather than supplement parking at the ski area if the transportation study indicates an operational cost savings primarily due to the decreased snow removal costs. Other winter sports activities (snow play, cross-country skiing, snowshoeing) could increase throughout

the park. Such an increase would not necessarily occur in the Wolverton area since these activities are not dependent upon mechanical tows. Since the parking structure is intended for use only during the peak visitor use season (May to September) the existance of the structure should have no impact on visitation growth during the winter months.

- 6. No. Neither can it be stated that under existing conditions actual vehicle traffic in the study area is the primary contributor of existing air quality standard violations for oxidants. Anticipated reductions in vehicle volumes as a result of increased use of a transportation system will reduce the amounts of emmitted pollutants that will occur if visitation levels remain at or near existing levels. If it can be assumed that increased visitation will occur at the same rate for both the proposal and alternatives then the proposal will continue to be the most environmentally favorable with respect to air quality.
- 7. A thorough evaluation of air quality impacts will be conducted during and after the completion of the transportation study. Such an evaluation is possible only with a monitoring program to evaluate existing base line levels. Should the results of the monitoring study indicate, as is strongly believed, that local air pollutants are largely a result of transport from sources outside the park then there is little, if anything, that the park can do to control these sources. Therefore, mitigating measures such as closing the park to vehicle traffic would have an insignificant effect on the park's air quality. However, should the transportation study and monitoring indicate that park activities could significantly affect air quality, then appropriate mitigating measures will be evaluated in detail. The final review will be made available for review and comment.

### b. Comments by State Agencies

Comments were received from the following agencies:

State of California Clearinghouse-The Resources
Agency of California incorporating comments from;

Department of Conservation

Department of Conservation

Fish and Game Food and Agriculture

Health

Navigation and Ocean Development

Parks and Recreation

Transportation

Water Resources

Air Resources Control Board

Solid Waste Management Control Board

State Water Resources Control Board

The Energy Resources Conservation and

Development Commission

Public Utilities Commission

State Lands Commission

State Historic Preservation Officer

(Department of Parks and Recreation)

Department of Transportation

EDMUND G BROWN JR.
GOVERNOR OF
CALIFORNIA



Air Resources Board
Coloredo River Board
San Francisco Bay Conservation and
Development Commission
Solid Waste Management Board
State Lends Commission
State Reclamation Board
State Water Resources Control Board
Regional Water Quality Control Boards
Energy Resources Conservation and
Development Commission

### THE RESOURCES AGENCY OF CALIFORNIA

SACRAMENTO, CALIFORNIA

1978 FEB 2 1

National Park Service Sequoia and Kings Canyon National Park Three Rivers, CA 93271

#### Gentlemen:

The State of California has reviewed the "Draft Development Concept Plan, Sequoia and Kings Canyon National Parks, California", September 1977, and the "Draft Environmental Statement, Development Concept Plan, Sequoia and Kings Canyon National Parks, California" which was submitted to the Office of Planning and Research in the Governor's Office.

This review is in accordance with Part II of the U. S. Office of Management and Budget Circular A-95 and the National Environmental Policy Act of 1969. It was coordinated with the Departments of Conservation, Fish and Game, Food and Agriculture, Health, Navigation and Ocean Development, Parks and Recreation, Transportation, and Water Resources; the Air Resources, Solid Waste Management, and State Water Resources Control Boards; the Energy Resources Conservation and Development, Public Utilities, and State Lands Commissions.

The State's comments are as follows:

#### ACCESS

The Department of Water Resources (DWR) coordinates the collection of snow data for the California Snow Surveys Program. The attached maps show two measurement sites within the planning area:

1. Giant Forest Snow Course No. 246, northwest quarter of Section 6, Township 16 south, Range 30 east, MDB & M, established in 1930 under special use permit to DWR.

1

2. Giant Forest Snow Sensor No. 568 (telemetered), southwest quarter of Section 6, Township 16 south, Range 30 east, MDB & M, established in 1969 under special use permit to the U.S. Corps of Engineers.

1

5

The final report should state that these sites will be protected and that continued access will be allowed for maintenance and snow measurement as provided for in the existing permits.

### AIR QUALITY

Although the draft environmental statement contains a good assessment of air quality in the Giant Forest area, it should include a quantified comparison of existing emissions in the area with projected vehicular emissions which would occur in the Giant Forest/Lodgepole study area as a result of implementing the shuttle system.

It is recognized that plant damage within the park is predominantly due to photochemical oxidants transported into the park from the San Joaquin Valley. Mitigation of this damage is not likely until there are effective controls on the emissions of oxidant precursors in the San Joaquin Valley.

Since the 1977 Clean Air Act Amendments establish all National Parks larger than 6,000 acres as mandatory Class I areas for the prevention of significant deterioration, these areas are subject to the Environmental Protection Agency's regulations (40 CFR 52) based on 1970 and 1977 amendments to the Act. In response to these regulations, the Air Resources Board (ARB) is developing a State Air Conservation Program whose goals include protection of air quality for "public trust" lands. This would require stringent limitations on new sources of emissions, both inside and outside Class I areas. ARB staff would like to work closely with the Park Service planning staff to determine the most feasible methods of including the development of the State program in the park's plans.

#### GEOLOGY

There is no explicit discussion of the geologic criteria used to aid selection of the following sites: Red Fir, Clover Creek, and Wolverton Corrals. How extensive an investigation was conducted to determine potential geologic hazards at these sites? The plan should discuss the presence or absence of potential geologic hazards. For example, if the Clover Creek area has a negligible problem with slope failure and this was a main reason for selection of the site, then it should be so stated.

It is mentioned on page 13 of the plan that the Wolverton Ski Area has high potential for erosion in places. Are the ski slopes vegetated in any way? Is there a plan to prevent acceleration of the rates of erosion on the slopes?

266-22

The discussion on page 8 indicates that potential geologic hazards have been investigated to some extent in Lodgepole Valley. Of particular concern to us are the potential rockfalls and landslides, the hazards of which are accentuated by both the steep slopes and narrowness of the valley. The campgrounds and proposed structures may be subject to danger from these hazards, especially during a large earthquake. The "C loop" and Forest Service housing appear to be particularly vulnerable because of their proximity to the "boulder-covered slope" as is shown on pages 11 and 33. Furthermore, the proposed recreational vehicle camping area is almost directly below a known landslide on the south slope of the valley. These items should be discussed.

The study area is approximately 55 to 65 kilometres (35 to 40 miles) from the epicenter determined by Greensfelder (California Geology, 1972, v. 25, no. 3, p. 60) for the 1872 Owens Valley earthquake. This earthquake produced an average intensity (Modified Mercalli Scale) of VIII or possibly IX in the study area according to Greensfelder's (1972) map. These intensity values equate with significant damage to structures and some ground disturbance, which could include local slope failure.

Large landslides are associated with an intensity of X, the value assigned to the 1959 Hebgan Lake earthquake near Yellowstone National Park. Most loss of life during this earthquake resulted from a landslide that overwhelmed a campground in a narrow canyon. Reference to this disaster is not meant to imply that a similar event will occur in Lodgepole Valley, but the possibility of such an event should be recognized and addressed in the subject report.

#### SOLID WASTE

The concessions should stock items which reduce the litter problem and whose manufacturing is more energy efficient; i.e., paper rather than styrofoam, glass rather than metal beverage cans. A deposit system on beverage containers should also be considered.

Development of day use areas and campgrounds, as well as lodging for visitors and employees, should include recycling programs. Funds for such projects may be available under SB 650. Inclusion of an educational display on recycling and litter control at the visitor information center should also be considered.

8

The report should also describe the effect of the park's development on the quantities and types of wastes produced as well as on collection and disposal practices.

9

It is requested that the Park Service submit Reports of Waste Discharge to the Regional Water Quality Control Board and obtain Waste Discharge Requirements for the proposed interim improvements to sewage treatment facilities at Giant Forest and for the proposed new treatment and disposal facilities at Clover Creek and Redfir.

10

Thank you for the opportunity to review this report.

Sincerely,

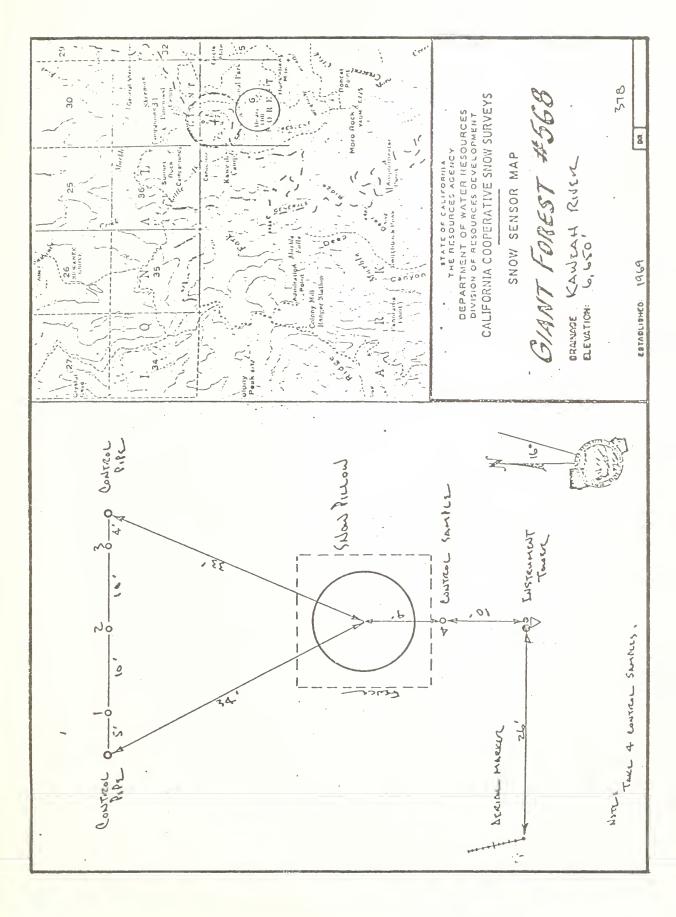
L. FRANK GOODSON

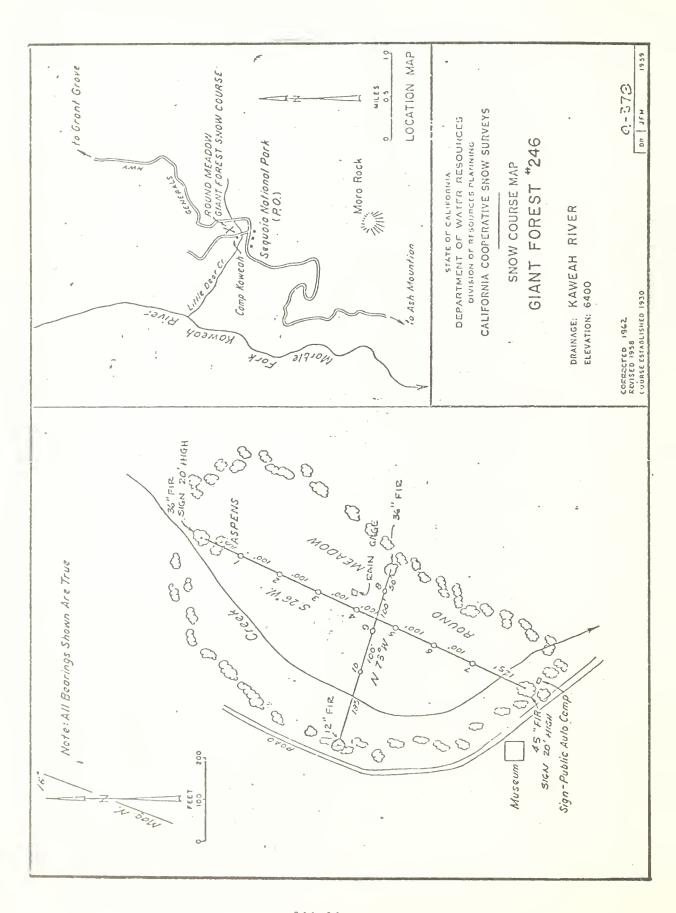
Assistant Secretary for Resources

#### Attachments

cc: Director of Management Systems
State Clearinghouse
Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

(SCH No. 77121951)





## Response to Comments by The Resource Agency of California

- 1. Subject statement has been included in "Interrelationship with other Projects", Section I.D.
- 2. See previous response to comments from the Environmental Protection Agency. A final evaluation of air quality impacts is dependent upon details of the circulation system, type of shuttle vehicles (propane versus gasoline combustion), and size of individual vehicles.
- 3. Concur on the fact that most air pollutants within the park are a result of transport. The National Park Service would appreciate and certainly anticipates the opportunity to work and cooperate with the Air Resources Board on future planning efforts.
- 4. Geological constraints were evaluated primarily for the Lodgepole Area where a clearly defined rockslide potential was identified. Accordingly, no facilities were designated for those particular hazardous areas. Remaining developed areas were selected for development secondarily because of the lack of discernable geological constraints such as slope failure. Rather, criteria such as relative soil types, slope, previous disturbance, and proximity to other developed areas were considered more essential. It should be noted that specific geologic constraints or hazards at these areas were not mentioned in previous evaluations of the areas.
- 5. The ski slopes are vegetated with a sparse to moderate cover of grasses and herbaceous plants. Continued soil compaction and potential erosion are considered an unavoidable adverse effect and are mentioned as such within the draft Environmental Statement. There is no present plan to prevent soil erosion of the area, although seeding of the area with soil stablizing plants is within the capabilities of the park and can be accomplished with or without the proposed plan.
- 6. Potential landslide hazards for the Lodgepole area have been discussed in the Description of the Environment (Section II.B.1). An onsite preliminary evaluation was conducted by a National Park Service geologist for historical evidence of rock/land slide areas within the valley. The one significant site discovered was at the proposed recreational vehicle camping area which was subsequently redesigned to avoid the potential slide area. Additional evaluation revealed that remaining slopes in the valley were relatively stable as evidenced by mature stands of timber and no historical record of slides. Therefore, it was concluded that no historical evidence of movement was sufficient evidence that slopes were sufficiently stable for continued use of the valley floor without a significant threat to occupants.

However, your comments are sufficiently significant to warrant further investigation of the Lodgepole Valley slope stability with an evaluation of estimated potentials for movement extending beyond historical evidence.

Therefore, further evaluation of long-term stability will be conducted in conjunction with the comprehensive planning stages. Furthermore, no construction will occur prior to this evaluation. The results of the evaluation will also indicate the validity of long-term continued use of the valley for both employee housing and visitor camping. This additional evaluation has been included in Section IV, Mitigating Measures.

- 7. and 8. A deposit system on beverage containers is in effect in all areas of the National Park System, and recycling programs are encouraged. Concessioners are encouraged to stock supplies which reduce litter and are energy efficient but there are problems obtaining such items. The Development Concept Plan does not address these problems since they are related to policy and management rather than development planning and are better addressed in the Statement for Management prepared for each park.
- 9. The proposals in the plan do not create any increase in visitation and the quantities and types of wastes produced would not significantly change. The methods of collection and disposal would not change because of any element in the proposed plan. The existing solid waste pickup program is under contract with a local disposal company. Solid waste is removed from all National Park Service facilities and transported to a sanitary land fill outside the park.
- 10. The Regional Water Quality Control Board has been and will continue to be consulted throughout the planning and design process and all reporting and permit proceedings will be complied with. A waste discharge permit (No. 78-148, issued on September 22, 1978) has been obtained for the interim improvements at Giant Forest. A new permit will be requested for the Clover Creek-Red Fir area following the preliminary design stage of the treatment system.

PARTMENT OF TRANSPORTATION

KNONINGERICKENIK O. Box 12616 Fresno 93778 (New





car / In

from each

directions

January 26, 1978

Superintendent Sequoia and Kings Canyon National Park Ash Mountain Three Rivers, CA 93271

Dear Sir:

In perusing the draft Development Concept Plan for Sequoia and Kings Canyon National Park submitted with your letter dated December 8, 1977 we have the following comment:

It is stated under "visitor capacity" on Page 49 that
the Generals Highway has a practical capacity of from
385 to 400 cars per hour. pq. 33 q E.S. - "from both direction".

This statement can not be confirmed without more information on speed, freedom of manuver, traffic interruption, etc.; that would be allowed to achieve the above mentioned objective.

State Routes 180 and 198 lead into the area under study. Under our method of designating the level of service that accommodates various traffic volumes, Routes 180 and 198 are unable to carry the volume of traffic you specify for the Generals Highway.

Thank you for allowing us to review your plan for the Giant Forest/Lodgepole area and for the opportunity to comment. If there is a question arising from our comment, please call on us.

Yours very truly,

R. H. RAMEY, District Director of Transportation

M. B. Parlier

District Transportation Planner

JAR:sjb CC:JAR

# Response to Comments by The Department of Transportation

1. The road capacity figures were based on a 1969 analysis of the park road corridor which included such factors as sight distances, shoulder widths, grades, passing lanes, etc. The proposed transportation study will further refine the road capacity figures. Your statement that the approach roads to the park are unable to carry the volume of traffic we specify for the Generals Highway only reinforces our conclusion that visitation cannot increase substantially.

# c. Comments by Local Governmental Agencies and Organizations

Comments were received from the following:

County of Fresno (Planning Department)
County of Tulare (Board of Supervisors)
Friends of the Earth
Government Services, Inc.
Sierra Club



### PLANNING DEPARTMENT

4499 E. KINGS CANYON ROAD

FRESNO, CALIFORNIA 93702

PHONE 488- 3842

February 8, 1978

Mr. David D. Thompson, Superintendent Sequoia and Kings Canyon National Parks Three Rivers, California 93271

Dear Mr. Thompson:

Subject: Draft EIS for the Development Concept Plan for the Giant Forest/Lodgepole Area of Sequoia and Kings Canyon National Parks

We have reviewed the above referenced document and are of the opinion that the proposed project will have no significant effects on Fresno County.

Thank you for the opportunity to review this document.

Very truly yours.

Billy J. Peck Staff Analyst III

BJP:fh'





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February 24, 1978



David D. Thompson, Jr., Superintendent Sequoia and Kings Canyon National Parks Ash Mountain Three Rivers, CA 93271

Dear Mr. Thompson:

The Tulare County Board of Supervisors has reviewed the proposed development concept plan for the Giant Forest/Lodgepole area as requested by your letter of December 8, 1977. The County Planning Department has also presented the proposed plan to the Tulare County Planning Commission for their review and comment. As a result of our discussions, we offer the following comments for your consideration:

- 1. The Plan does not show additional campsites and lodging facilities for future growth. Increased usage of the area is inevitable and should be accommodated through construction of adequate facilities. We note that by 1990, an increase of 5,000 visitors per day is anticipated during the peak season.
- Plan implementation costs appear excessive considering there will be little expansion of existing facilities and services.
- 3. Why was the air pollution problem of the 1700 car garage not fully addressed in the draft Environmental Statement when air pollution was fully addressed in the Mineral King Environmental Impact Study? The 1700 spaces to be provided appear to be triple the amount currently existing in the Giant Forest/Lodgepole area.
- 4. The community of Three Rivers will be impacted significantly if overnight capacity is not increased within the Park. Such external impacts should be given greater consideration in the final plan document.
- 5. Is the National Park Service's planning coordinated with the Bureau of Land Management's proposal for a Case Mountain Recreation Complex to be located 4 miles east of Three Rivers and other planned BLM recreational and historical developments in the Three Rivers area?
- 6. Will the cost of operating and maintaining the shuttle bus system be an additional expense for park visitors?

DONALD M HILLMAN CHAIRMAN . - 2ND DISTRICT JAY C BAYLESS
COUNTY CLERK - RECORDER

CYLDE R GOULD VICE CHAIRMAN . - 1ST DISTRICT

BOBBY G CRAGG CLERK BOARD OF SUPERVISORS David D. Thompson February 24, 1978 Page 2

The Board of Supervisors is appreciative of the National Parks Service's effort to safeguard the natural heritage of our Sierra Nevada. We take pride in Sequoia National Park and hope our long and pleasant relationship will continue.

Thank you for the opportunity to comment on the proposed plan. Our staff will be happy to discuss any of the concerns expressed above with you at your convenience.

Sincerely,

TULARE COUNTY BOARD OF SUPERVISORS

Donald M. Hillman, Chairman

DMH:jr

# $\frac{\text{Response to Comments by}}{\text{County of Tulare}}$

- 1. The National Park Service cannot continue to build facilities to accommodate ever-increasing visitation. Levels of visitor services were determined by the General Management Plan and the Development Concept Plan conforms to these levels.
- 2. Costs are based on the construction of new facilities, not expansion of facilities. Construction costs are generally high in national parks due to the short construction season and the environmental constraints placed on contractors.
- 3. See the response to the Environmental Protection Agency in regard to air pollution. The size of a parking structure will always exceed the number of parking spaces in a given area since cars must be held for a longer period of time and space must be provided for cars which would normally be traveling on the road system. The 1700-car figure is based on future, not present, needs for visitor parking. That is why it is proposed to construct the garage in several phases.
- 4. This comment was in part addressed in the response section to the United States Forest Service. It is true that additional visitor pressure may occur within the Three-River's area and other communities. However, the associated response of the private sector cannot be directed by the National Park Service or other federal agencies; neither can the magnitude or cumulative effects be precisely predicted due to the large number of variables involved, such as prevailing interest rates and the general state of the national economy. As such, a more general statement as to the most likely effect has been included in Section III.B.1.
- 5. Consultation with Bureau of Land Management is a continuing responsibility of the park superintendent. The Bureau of Land Management projects do not directly affect the development concept planning for the Giant Forest-Lodgepole area but probably would result in increased day use.
- 6. The cost, if any, to park visitors has not been determined. Generally, when the primary purpose of a transportation system is for resource preservation, there are no user fees.



### FRIENDS OF THE EARTH

124 SPEAR SAN FRANCISCO CALIFORNIA 94105 (415) 495-4770

February 21, 1978

Superintendent David Thompson Sequoia and Kings Canyon National Parks Ash Mountain Three Rivers, CA 93271

RE: Draft Development Concept Plan and Environmental Statement for the Giant Forest/Lodgepole Area (Sept. 1977)

Dear Sir:

We are pleased with the decision to move the concessions out of Giant Forest. In addition to the damage being done to the giant sequoias, lodging in the grove is discriminatory toward those wishing to sleep under the stars and those unable to afford the accommodations. We also strongly support an interpretive shuttlebus system for Sequoia. However, we are distressed by the Wolverton corrals location chosen for the 1,700-vehicle parking garage/staging area.

We feel that staging areas should be outside or on the edges of the parks, not in the middle. In addition to the environmental damage that would be done constructing such a massive structure, the location chosen for the parking garage/staging area would for all practical purposes prevent the future option of eliminating private vehicles in the Giant Forest section of the park. It would also make connections to mass transit from the population centers difficult.

Instead, we would recommend two staging areas. One in the area of the Ash Mountain/Three Rivers entrance could also serve Mineral King should that be desirable in the future. This location is close to the Giant Forest and would allow private vehicles to be eliminated on the most scenic—and steepestland most dangerous—section of the park road. As proposed, visitors from the south will have to drive through the Giant Forest to catch a shuttlebus back to the area. Another staging area around the Big Stump/Grant Grove entrance could also serve visitors to Kings Canyon, which for all practical purposes is part of the same park.

By bringing the staging area(s) to the park edge, it would be possible to move some or all of the concession facilities outside the park in accordance with NPS policy:

If adequate facilities exist or can be developed by private enterprise to serve the park visitors' needs for commercial services outside of park boundaries, such facilities shall not be provided within park areas.

As is done in Mount McKinley National Park, private vehicles belonging to campers could be allowed in as far as the drive-in campgrounds. Campgrounds along the middle section of such a shuttlebus system road could be walk-in sites so that private

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Sequoia National Park (Giant Forest/Lodgepole DCP) Feb. 21, 1978 Page Two

vehicles could be eliminated from much of the road during the busy season.

Since alternative locations outside the park for the staging area/parking garage are not even considered in the environmental statement, we feel that this Development Concept Plan should be redone. We definitely support the decision to remove developments from Giant Forest. Since major changes are required anyway and since considerable sums of public funds are involved (over ten million dollars), we think it would be preferable to spend a little more and greatly improve the transportation situation. Sequoia could be a model park in this regard. The DCP as proposed would preclude the changes in access that will probably have to be made as transportation modes change in response to the fossil fuel shortage.

Friends of the Earth appreciates this opportunity to comment on the future management of Sequoia National Park.

Yours truly,

Chuck Williams

National Parks Representative

## Response to Comments by Friends of the Earth

- l. Consideration of staging areas outside the park came early in the planning effort and were discussed during public workshops. The extremely high cost of such a system, the lack of adequate sites, and the significant inconvenience to visitors, resulted in this option being dropped from the <u>feasible</u> alternatives under consideration. As long as the Generals Highway remains the primary route of travel and the visitors continue to use the park on a drive-through basis, the remote staging areas would only result in a significant increase in the mileage traveled on the highway. The average visitor, if required to park at a remote staging area would travel the same route three times; twice on a shuttle system and once in a private vehicle.
- 2. The option to relocate facilities outside the park met with overwhelming public opposition during the early phases of the planning effort. Furthermore, past economic studies have indicated that private enterprise could not provide the same level of visitor services for a short visitor use season and still make a profit.
- 3. See response number 1. Again, it must be emphasized that  $\Lambda$  Sequoia National Park is primarily a drive-though park. The plan allows for future changes in modes of transportation through the flexibility to build the parking structures in phases and to modify the transportation system to meet changing requirements.

quality—a standard

February 27, 1978

Mr. David Thompson, Superintendent United States Department of the Interior National Park Service Sequoia & Kings Canyon National Parks Three Rivers, CA 92271

Dear Mr. Thompson:

Thank you for the copy of the <u>Draft Environmental Statement</u> covering the proposed development concept plan for the <u>Giant Forest/Lodgepole</u> area of <u>Sequoia National Park</u> and your invitation to provide any comments to that report.

Over the last five years of our Corporation's involvement as a concessioner in Sequoia and Kings Canyon National Parks, we have reviewed various documents and reports related to the proposed redevelopment and relocation activities. Rather than attempting to consolidate our comments as they may or may not differ from portions of the indicated environmental statement, I have enclosed copies of salient items of correspondence that have expressed our views as the course of planning has proceeded.

As you will note, in our past comments we have not suggested that it was within the concessioner's purview to arque against the relocation of visitor facilities from the Giant Forest Village area. However, we had assumed that all parties recognized that the development concept plan proposes the relocation of existing concessions facilities that have a fair and sound value in their present location. Some of the facilities were constructed during the relatively recent past and other major structures have, during the past ten years, undergone major remodeling and renovation at substantial cost. Recently, an article in the Los Angeles Times reported that the concessioner at Sequoia National Park would be spending some \$11 million in connection with the relocation of the concessions facilities. While we recognize the Los Angeles Times may have been misinformed, such a report does indeed concern us. It would be unfortunate if the public should come to believe that the concessions activities at Sequoia National Park would or could, within their existing financial framework, support such a capital investment. If one assumes that major economic factors are relative and significant elements of the total environment, it would seem appropriate to include some substantive

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1135 21st ST., N.W., WASHINGTON, D.C. 20036 (202) 331-8080

Mr. David Thompson, Superintendent February 27, 1978 Page Two

comment in the final environmental statement about the economics of the proposed relocation, i.e., how it would be funded and the impact of that on the future cost of services to the park visitor. As I am sure you have concluded from reviewing the Concessioner's Annual Financial Reports of past years, the scope of concessions activities at Sequoia/Kings Canyon National Parks is not sufficient to finance, either through debt or revenue, over a reasonable span of time, a capital investment approaching \$11 million. That is further compounded by the fact that many who are now interesting themselves in National Park Service concessions contracts are suggesting and supporting shorter contractual periods.

Aside from the rather clear evidence that any private investor funding the relocation of the Giant Forest concessions facilities would be unable to realize anything approaching a reasonable return on his investment, the depreciation costs alone would impact dramatically on the park visitor through higher levels of rates and prices. The ratio of capital investment to potential revenue would greatly exceed that in any National Park situation with which we are acquainted and would, consequently, force the rates and prices at Sequoia not only far above the present level, but above those in other National Parks. While we are not fully acquainted with the required appropriate content of an environmental statement, it would appear to us that some of the provisions of Volume 40 of the Federal Code of Regulations, Section 1500.8, would suggest that the effects of such an economic impact resulting from a proposed action, such as the relocation of the facilities in question, should be identified at least as a significant secondary effect, if indeed not a primary one, on the prospective visitor to the Park.

Recognizing that the foregoing comments might be construed by some to specifically reflect the opinion of the incumbent concessioner, we strongly urge that you recommend that the National Park Service planners engage some competent, independent consulting firm to undertake a feasibility study that would identify levels of prices and rates that would necessarily need be charged to sustain an investment of the indicated magnitude, giving consideration to the effects of projected inflation on all of the operating costs, as well as the escalation of the currently projected \$11 million figure, as it might be pushed upward by inflation with each passing year.

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While we have numerous other comments on the development concept plan, they are not specifically related to comments on the Environmental Statement, excepting as they refer to the overall economic environment; accordingly, we are not presenting them at this time. Specifically, these additional comments refer to the broad mix of overnight accommodation facilities, the feasibility of year-round hostel facilities, and other such matters that we would hope to discuss at further length when the specific planning stages commence. In the meantime, however, if we may in any way be of further assistance in

Mr. David Thompson, Superintendent February 27, 1978 Page Three

developing any information or working with the National Park Service Planning Personnel, we would be most pleased to make the necessary time and resources available.

Once again, thank you for this opportunity to submit our comments.

Sincerely,

-WALTER C. WILLIAMS Vice President

Recreation and Parks

WCW:1mf

Attachments

# Response to Comments by Government Services, Inc.

- 1. The Development Concept Plan and Draft Environmental Statement identify concessioner related costs. The methods of financing the proposed development is subject to future negotiation between the National Park Service and the concessioner. It may evolve that the National Park Service will construct and own the facilities, leasing them to a concessioner to operate.
- 2. Additional feasibility studies will be conducted during the comprehensive design phase which will more precisely define the types of accommodations and other facilities. The rates to be charged are subject to future negotiations.

#### STERRA CLUB COMPENIS ON DEVELOPMENT CONCEPT PLAN FOR

### SEQUOIA-KINGS CANYON NATIONAL PARK

The Sierra Club commends the National Park Service on its Draft Development Concept Plan for the Giant Forest-Lodgepole area of Sequoia-Kings Canyon National Park. We applaud and strongly support the 10 year plan to relocate facilities in the area in order to reduce impact on the natural values of the Park and enhance the quality of the Park visitor's experience. We would like to comment on the proposed plans for each of the specific areas of the Park that would be affected.

#### GIANT FOREST-LODGEPOLE

We are particularly pleased with that part of the DCP that calls for removal of all but a few historic buildings in Giant Forest. There is no more important natural feature in Sequoia National Park than Giant Forest. We urge that everything possible be done to return it to natural condition and that it be maintained in that condition permanently.

We also support the renovation of the campground at Lodgepole. Removal of the campsites next to the river is an excellent suggestion as is the concept to segregate different types of campers. It is not pleasant for a tent camper to set up under the shadow of a large recreational vehicle. The new campsites should be designed and landscaped to provide the maximum amount of privacy. Noise is currently a problem at Lodgepole. We suggest restrictions be imposed on loud radios and generators used by recreational vehicles. Noise restrictions could be imposed immediately.

We are not aware of any serious environmental problems that would be imposed by locating visitor lodging at the Clover Creek site. The same is true of the proposed site for the sewage disposal facilities. We are pleased to see that both the visitor lodging and campsite proposals at Lodgepole do not call for an increase in capacity. Any increase in demand for overnight facilities should be accommodated outside the Park.

#### WOLVERTON STAGING AREA

The proposed Wolverton Staging Area is the only part of the proposal about which we have serious reservations. We suggest the National Park Service give consideration to providing parking for day use visitors outside of the Park and provide public transportation into the area.

The impact of mechanized access upon the Park is in direct proportion to the number of vehicles entering the area. These impacts include noise and air pollution as well as the parking facilities. Traffic congestion on the Ash Mountain-Ginat Forest Road and traffic tie-ups entering and leaving the proposed parking facility would further degrade the visitor's experience. We believe it should be a general policy in all of the National Parks to discourage the use of private automobiles in so far as possible.

We offer the following proposal for your consideration. A parking lot and staging area could be located out of the Park near Three Rivers. This facility

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Page 2-Sierra Club Comments on DCP

could serve not only the Giant Forest-Lodgepole area but also Mineral King. We believe Mineral King will shortly become part of Sequoia National Park. If it does not, such a staging area could be operated jointly with the U. S. Forest Service. Shuttle buses could carry visitors to both areas.

Day use visitors could be encouraged to use the facility. Only limited day use parking should be provided in the Park and visitors could be advised of this situation before entering. Persons who plant to stay overnight could enter the Park in their automobiles provided overnight accommodations were available. Some day use visitors would want to enter the area via Ash Mountain and exit at Grant Grove. Entrance tickets sold to such visitors could be made valid for exit at Grant Grove only. An extra fee could be charged to visitors entering and exiting at Ash Mountain on the same day. In addition, consideration should be given to an extra charge for entering in an automobile to encourage use of the public transportation.

A similar staging area could be provided at Stony Creek for people entering the area from the north.

Overnight facilities are now available at both locations and could be easily expanded for people who prefer to stay outside the Park or arrive to find the facilities inside the Park fully booked.

The projected cost of the parking garage is over \$10 million, over one-half of the government's cost for the entire project. Our suggestion for staging areas outside of the Park could be implemented on a trial basis and then be made permanent if successful. The only extra cost for the staging areas would consist of lease or purchase of property in the Three Rivers area. The U.S. Forest Service could provide a site at Stony Creek.

The rolling stock and personnel necessary for trying out this suggestion would be required even if the DCP for a staging area at Wolverton should be decided upon in the final analysis. If our suggestion were successful, only a fraction of the \$10 million earmarked for the Wolverton Staging area would be needed.

It is our understanding that this plan is only conceptual in nature and that the details for implementation of each portion are not yet developed. We would appreciate being kept informed as the project proceeds so that we may offer our suggestions at the proper time. We would particularly appreciate a response to our suggestion for staging areas outside of the Park and provision for public transportation into the Park from those areas.

We would like to congratulate you again on this forward looking DCP. It calls for the implementation of goals the Sierra Club has been working toward for many years in the Giant Forest-Lodgepole area of the Park.

Thank you for this opportunity to comment. We look forward to working together with you as the Development Concept Plan proceeds.

Joe Fontaine for the Sierra Club Star Route, Box 1142 Tehachapi, CA 93561

# Response to Comments by Sierra Club

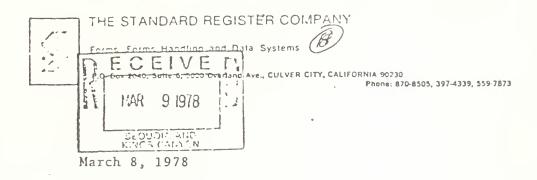
- 1. These are management problems which are not addressed in a Development Concept Plan. Separation of camper types is addressed but camper rules and regulations are the responsibility of the superintendent.
- 2. See responses to Friends of the Earth.

### d. Comments by Individuals

Comments were received from the following:

David J. Anderson
Bill Denneen
Guernsey P. Frazer
Clifford S. Garner
Arthur C. Hall
Norman Hill
Grant L. Hubbard
Michael R. Jones
Delora S. Sampson
David L. Schein
Dean F. Schlobohm
Bret Taylor

Only those comments addressing the adequacy of the Draft Environmental Statement have received responses in this document. In most instances, individuals have received letters from the superintendent, Sequoia and Kings Canyon National Parks in which he responded to their other concerns.



National Park Service Sequois and Kings Canyon National Park Three Rivers, California 93271

Attn: David D. Thompson, Jr. Superintendent

Enclosed are the two transcripts of the public meetings on the Giant Forest/Lodgepole Development Concept Plan which you sent for my review. I truly appreciate the opportunity to read them since I was unable to attend the meetings due to distance and available time during the first week of February.

The ensuing discussions after each meeting must have been as informative as the meetings themselves. My interest in the final plan and its implementation continues and I would appreciate any information regarding additional meetings and/or activities concerned with the development of the Park. Please feel free to solicit any assistance which I may be able to volunteer as a private citizen to your office.

Thank you for sending the transcripts and I hope I may be of service through further participation.

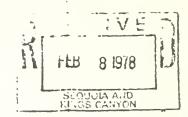
Sincerely yours,

David J. Anderson/prd 15738 Drell Street

Sylmar, CA 91342

(213) Home 367-0037 Office 870-8505 Allan Hancock College 800 South College Drive Santa Maria, California 93454

Superintendent
Sequoia and Kings Canyon Nat'l Parks
Ash Mountain, Three Rivers
Calif. 93271



Dear Superintendent,

Re: Hearing Feb. 1st in Fresno concerning draft development Concept Plan for Giant Forest/ Lodgepole area.

I have not read the E.I.S. on this proposal but would like the opportunity to read the statement if a copy could be sent.

I specifically want to speak to the Clover Creek development proposal.

In 1958 while a seasonal naturalist in Sequoia I "discovered" Clover Creek. Each year I return to "my" creek. Most summers I take students in my Backpacking Class to this creek for their first experience at backpacking in the Sierras. My daughter at three saw her first bear crossing the creek here. The dipper, or water ouzel that John Muir wrote so eloquently about is seen here every summer. About six years ago I noted surveying stakes in the area and thought that was the end of "my" creek.

It is with with sadness that I read about the proposed development plan for another wild area. This letter is to inform you that there is at least one old teacher and hundreds of his former students that have enjoyed the wildness of Clover Creek and mourn its passage to development (and destruction).

Sincerly yours,

Bill Denneen

SECULIA SIED KIMOS CALNON

GUERNSEY PRESTON FRAZEK
240 SO. CLOVIS # 116
FRESNO, CALIFORNIA 93727

(21)

March 5 1978

Superentendent

Kings & Sequoia National Park

Ash Mountain

Three Rivers, Calif 93271

Sir,

Retain private transportation and overnite accommodations in the park. The Sierra Club is a powerfull letter writting organization depriving an unorganized majority. We need an increase in the ability of the parks to handle people not a campaign by the Sierra Club to keep people out. The Park Service has done a fantastic job and will continue to do so if left to honest public opinion and not subjected to a lopsided letter campaign.

Trusting you will be as for ward looking in the future as you have been in the past.

Sincerely

Guernsey P Frazer

Mr. & Mrs. Clifford S. Garner 444 Saratoga Ave. Apt. 29H Santa Clara, CA 95050 Mr. David D. Thompson, Jr, Sukuntendent gan 26, 778 Segnsuad Kinge Congon Wall Parke. lak With, Three Giveny Ca 93271\_ The thest wholesment Conest then (Set 97)
for Scient Frust/Lodgefole, sequera Dear Mrs. Thompson -Think you for earling my wife of me the Seft 1977 Duft Sevel front Coneft Plea for the Giest Forest Lodge love area of Liquina. We will not ke atte Intend the Feb. I Fremo neiting nor the Feb 2 Visabe meeting, of so offer here several comments. My whe & I have been nearly annual visitors to Great Fruit Lodge for the heat 15 year, staying 3-E days on a GFL Tope & tillure cakin. We see very sorry trace the GFL aux changel at all, for it re greaters it is. Mor do no book forward to greatly insured numbers of health in the Creek Mindow & adjust area, which the proposed transportion may encourage. The Clove Creek accommodations of timing facilities befored troublant the Stat once but they would turn out to be more "inclustionabled" then the current once, at lust the is what her befrend et "reenite, e.g. Of the types of bodying perposed for Clove Prech only Type B ("stended bedying unite"), \$58 of dreft, would be of any presentle intrest tina, of tremonly if they are single unite (no wells should not on unite). Close Cuch is much faither than GTL from the area we are most interested on, remely trailed out of the lite are, out of the descent Markow our, of the Righ Sum out itself. To have to wait for trans It take one It & from Come truck to the intered they Then (change tran There from collector shutte to "interpretive shutte"?) + thene to Crever Medow would be most inonvinient of time consuming comband to the present ability to time ones can there duetty. Moreoner, if the "interpretise shutthe" one to wrom running coeffee on the sighter book musle stope to point them out by the tram drive or his assistant, both help us all! of the only "growy stree in the entre over is to he at Todgefole, then for we thisse Att more nursance: Itan from Current Mendewat noon to Sugary Onea, change tam & you to Lodgefor growing streets by hand dury productor (chit becf them millout a repyritor), then visit for them I return use in Clove Creek (we the colored ouste after hand with cubin),

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The are not trilled with the proposed changes, One of the lest untowisty "forestel axes

Sincerely, Offgamer Comments on the Draft Development Concept

MAR 2 1978

ECEIVPland ond the Draft Environmental Statement for MAR 21978 Giant Forest/Lodgepole

February 28, 1978

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David D. Thompson, Jr., Superintendant Sequois and Kings Canyon National Parks Ash Mountain Three Rivers, California 93271

Dear Sir:

I agree with the management objectives, the problem statement, and the general direction of the proposals given in the Draft Development Plan, such as: moving lodgings out of the Diant Forest, Laving no extensive improvements or developments at Wolverton, and closing part or all of the road to Crescent Meadows to the general public during peaks season; I disagree with some of the details, however.

Alternatives in the Draft Environmental Statement. I am unhappy with the alternatives given. Their main purpose seemed to be to-make the chosen alternative look better: the second alternative lad a highly visible multi-story parking structure at Wolverton, the third alternative put lodgings and different types of camping together at lodgepole despite public input strongly favoring separation of these functions, and both alternatives had extensive, expensive relocations of roads and campgrounds at lodgepole without achieving much benefit. I would like to have seen more realistic and attractive alternatives given.

Study Area. I am very disappointed that the Plan did not. encompass a larger area. Officials of Seguoia and Kings Canyon National Parlis promised the Sierra Nevada Fash Force and the Telipite Chapter of the Sierra Club that the planning process for

Diant Forest/Lodgepole would include coordination with Sequoia National Forest and with other areas of the Parlis to determine total carrying capacity for cars, camping, and overnight accommodations, feasibility of bus routes, etc., and yet the Plan covers only a very restricted area.

Staging Area. I particularly dislike the parting structures. I go to National Parks to enjoy their natural beauty; to have to park my car in an expansive concrete structure would detract considerably from my experience. Even Yosemite does not plan to build a parking structure in its Park. It also is the myor expense in the Plan. The structures could be replaced by several levels of terraced parking areas, arranged to preserve the gratest number of trees. This would not provide the same capacity on the structures, but careful planning could reduce the number of parking spaces required. Some steps which could be Taken are:

A. Extending the interpretive shuttle to Lodgepole, so that its parting area could also be used conveniently for the shuttle service.

B. Utilizing parling areas near the highway during the peak season for those who-want to-visit one area only. Signs could be placed at these lots urging those who plan to use the shuttle system to park at the central parling area or at Lodgepole. It could be tried on a trial basis.

c. Extending the collector shuttle to nearly From Service areas and to Grant Drove to reduce the number of vehicles

entering Sequoia National Vails.

D. Exploring the feasibility of providing Duo service to and

from nearby cities. I strongly wrose that you not build a parking structure in the Park until all alternatives have been considered and parking problems have made it an absolute necessity.

Clover Creek Lodgings. I hope that the lodgings at Clover Creek will be designed for a natural appearance. The winterized unite and hostels are oriented to give a good view of the high

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country, so particular care should be taken to make them as

unobtrusive as possible.

Grocery Store. Campers at Lordgepole will be less inclined to use their vehicles for shopping if the grocery store were at a more convenient location for them than in the present Plan. a second grocery store could be built at Clover Creek to reduce the temptation to visitors there of using private vehicles for shopping.

Crescent Meadow Parking during Peak Season. Some Ribers will be returning to Crescent Meadow during the peals season at hours when the shuttle system is not operating; these people should be taken into consideration. Perhaps Willerness Permit holders could be allowed to use The Crescent Meadow parking lot during peak season.

I realize that much of this letter is negative in Tone, but the cruticisms are meant to be constructive. I greatly appreciate the efforts of the Parls Service to involve the public, and to let them provide input before making serious changes. I am in full agreement with your objectives of preserving the resource while providing for the highest level of visitor enjoyment appropriate to the Park. The new developments should be designed to provide the maximum enjoyment of the natural beauty and maximum flexibility for the visitors, with a minimum of environmental damage at minimal expense. I hope we can heep in contact during the remainder of the planning and development process.

> Sincerely, Norman Kll 849 West Funtaman Reedley California 93654

# Response to Comments by Norman Hill

- 1. A wide range of alternatives were presented during public workshops. The alternatives in the Draft Environmental Statement represent a range of <u>feasible</u> alternatives based on earlier public input. There are numerous variations and it would be prohibitively time consuming and costly to describe every option and variation considered during the planning process.
- 2. The General Management Plan (1971) and the Statement for Management (1976) for Sequoia and Kings Canyon National Parks provide the overall capacities and other constraints for development in the Giant Forest/Lodgepole area. The Forest Service has been consulted throughout the planning effort.
- 3. The possibility of constructing parking areas on grade was studied. The parking structure was selected primarily because it would impact less land and vegetation and would be less visible from the Generals Highway.



### Wickes Forest Industries A Division of The Wickes Corporation

General Offices
POST OFFICE BOX 305
DINUBA, CALIFORNIA 93618
209/591-2000

March 6, 1978

Mr. David D. Thompson Jr.
Superintendent
Sequoia-Kings Canyon National Parks
Three Rivers, Ca. 93271

Dear Mr. Thompson:

This letter is in response to your request for comments on the Giant Forest - Lodgepole Plan.

Your plans to protect and preserve the  $\operatorname{Giant}$  Sequoia groves are to be  $\operatorname{\texttt{commended}}$  .

One purpose of the park, by definition in the establishing act was "as a public park, or pleasuring ground, for benefit and enjoyment of the people". It is difficult to believe that this purpose is being met by your management objective: Campsites will not exceed 1971 levels or 1700 for both parks.

Through the years people have come to Giant Forest not only to view the Sequoia Groves but also to spend time hiking, fishing, visiting caves, and swimming. In order to enjoy these activities, most people chose to camp in the area. A reduction in the number of campsites was made several years ago by removal of camps in the Sequoia Groves. To our knowledge these have not been replaced.

In our opinion it is absolutely essential to provide additional camping facilities in the Giant Forest Area in order to meet the purposes of the park.

Surely these are sites that can be feasibly developed.

#### Possibilities are:

- Use Red Fir for camping instead of maintenance and sewage disposal.
- Use Lodgepole for additional camping instead of National Park Service housing.
- Seek additional sites accessible from the General's Highway or Crystal Cave road.

Z

The proposal to introduce a shuttle system for access to Giant Forest is an acceptable concept.

There is a question as to the need or desirability for a \$10 million parking structure. Is this really in the public interest?

Our company has had a great interest in these National Parks through the years both because of our activities on adjacent U. S. Forest Service lands and because of the magnitude of the scenic and recreational resource that the parks represent. These comments are offered because of our concern that the proposed developmental plan will not adequately meet the desires of the public.

Sincerely,

ACH: jb

Arthur C. Hall,

Assistant General Manager

# Response to Comments by Wickes Forest Industries

- 1. See response to comment number 1 by the County of Tulare.
- 2. Numerous options were explored during the planning effort and at public workshops. The proposal incorporates elements from the various options in an effort to satisfy the expressed desires of the general public while meeting the mandate to minimize environmental impacts.

RECEIVED UEC 3 U 19/1

THE PROPERTY OF THE PARKS

LOUIS J KNOBBE DON W MARTENS GORDON H OLSON DAVID L REISDORF (1939-1971) JAMES B BEAR GRANT L. HUBBARD

LAW OFFICES

KNOBBE, MARTENS, OLSON, HUBBARD & BEAR

PATENT, TRADEMARK AND COPYRIGHT CAUSES

SUITE 1013 UNION BANK TOWER 500 SOUTH MAIN STREET

ORANGE, CALIFORNIA 92668 (714) B47-D954

NEWPORT BEACH OFFICE BY APPOINTMENT:

1605 UNION BANK BUILDING BIO NEWPORT CENTER DRIVE

December 27, 1977

CABLE ADDRESS: CALPAT

Mr. David D. Thompson, Jr. Superintendent Sequoia and Kings Canyon National Parks Three Rivers, CA 93271

Dear Mr. Thompson:

Thank you very much for your communication of December 8, 1977, forwarding me the draft development and concept plan and the draft environmental statement for my review and keeping me informed on the plans to update and modernize the facilities of the two great parks which you supervise. I am returning these documents to you in order that others may use them if you so desire. I concur in the proposals and support the plans which have been made.

I and my family have enjoyed many summers in these parks and hope that our children and grandchildren can have equivalent enjoyable experiences. During recent years, I have explored the wilderness areas of the parks, entering on the east and travelling the less known trails. All of our contacts and experiences with the park and its personnel have been entirely satisfactory. We find your staff to be cooperative, helpful and, when necessary, firm.

I compliment you upon your efforts.

GLH:s1

Enclosures

ACCUPATION N Dear People. These cic in Compresits on the circle Development Greet Plants I strongly support anverting Giant Forest to a day ruse area, and the plan to reduce. pridate visce use. I feelthis will do much to protect & reestablish the Nietural beauty & magnificenc. JI feel the Welverton Ski Area Shada

be removed, as I feel downhill skiing is for thrills not for appreciation of natural wanty as cross-country, finds to beand so it is in umpatible with the purposes

of Nictional Parks.

Sincery.

Mickell Romes

Michael R. Jones 1717 Campus Roud Los Angeles, CA 90041 ECEIVE MR 3 1978 MOVE CATANDA 3. Laury 37, 1774

Delora S. Sampson 2517 Sallee Lane Visalia, CA 93277

Suguera, Kings Congen Plat. Porces

Ash Meustain

This Kings, California

blan Siv! I have read with interest the prospeced yelon and the atternatives and find I perfer the proposed. to any of the Three alternatives. It Sociality some appropriate to simone. triced and enjoyed in a smuch men material triced and enjoyed in a smuch men material section of the Sequera should be top privity setting. The presentation of the Sequera should be top privity The removal of the Sugar parting lat at Jodgepole would head on eyesere. The shittle system can privide a men related, see conjusted method of trasportion and the her of specting reads helps previous natural areas.

There of specting reads helps previous natural areas.

It was comparing extendibility ment appears to be abouted in factor of leaguing. When should there if more elections connecting their comparing?

There you for the desitt incremental thement. Riling S. Kongara

1

Superintendent
Sequoia and Kings Canyon National Parks
Ash Kountain Three tivers, California 93271

Dear Sir:

Thank you for sending me copies of the proposed draft development plan and environmental statement for the Giant Forest/Lodgepole Areas, Sequoia and Kings Canyon National Parks, as per my request.

I have reviewed these two documents and find them to be comprehensive, attractive, accurate, and believe they will meet NEPA and CEQ guidelines. Your professional staff is to be congratulated.

As a geographer, I always look at the regional overview, and I caution your planners to consider truly regional impacts of management policy. While your assessment has addressed local county employment, travel routes, and expenditures, regional resources are also involved, such as riverine ecosystems, airsheds, wildlife, and timber. Also, while the Mineral King Canyon is not within this planning unit, the impact of the proposed development on future development of Mineral King should have been addressed, as this is a very sensitive issue and an important one, and will be affected by your management decisions if it is to be added to Sequoia National Park, as one current proposal is suggesting.

Also, I have a rather hard time accepting the fact that fully 51% of "National Park Service costs" (1977 dollars) for the construction costs involved in the proposed action will be spent on parking garages, mostly for the use of winter skiers and day users during the summer! This expenditure for a physical improvement should be re-evaluated and alternatives considered. Monies are too hard to come by and using the meager funds for a garage (while reducing impacts on roads and resources to some degree) seems a bit out-of-step with perceived management priorities.

Otherwise, I support the proposed development concept over all alternatives presented in the Plan and Statement.

Thank you for the opportunity to comment.

Sincerely,

David L. Schein

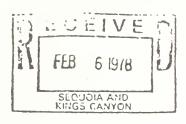
5219 N. Reserve Chicago, Illinois 60656

266 - 61

# Response to Comments by David Schein

1. Regional impacts of the proposal are addressed throughout the Draft Environmental Statement and some additional information has been included in the Final Environmental Statement. The impact of additional water consumption could affect downstream ecosystems but we will not have sufficient data to determine consumption rates and specific impacts until completion of the sewer and water studies. It is not anticipated that there would be any significant impacts on other components of the environment associated with the proposal.

Since there is no "plan" for Mineral King, it would be difficult to evaluate the impact of the proposal on a hypothetical future development. The plan for Giant Forest-Lodgepole does not propose any increase in use levels other than a gradual increase in day visitation that will natually occur. Development at Mineral King would more likely affect Giant Forest-Lodgepole. We do not foresee a decrease in visitation to the Giant Forest area due to the development of Mineral King. However, there could be less demand for lodging and camping. Legislation transferring Mineral King to the National Park Service has been signed by the President. This legislation calls for the development of a plan for management of the Mineral King area. This study will begin when funds are available and the interrelationships between Mineral King, other areas of the park, adjacent communities, and adjacent lands, will be given careful analysis.



5046 E. Grant Avenue, Fresno, CA 93727 Bebruary 2, 1978

Superintendent, Sequoia-Kings Canyon National Parks, Three Rivers, CA 93271.

Re: Giant Forest Management Plan

Dear Sir:

I did not expect to be called upon at the hearing at McLane High School last night and would like to clarify the statement I made.

Basicly, I do not disagree with the proposals set forth in the Plan. My point is that I believe that the priorities being considered are not in the correct perspective. As stated at the hearing the reason for the Plan is to prevent the "alteration of the Sequoia environment and to provide a meaningful experience for the Park visitor."

The area being considered is only that along the present roads and around the Giant Forest Concessionairs buildings. The remainder of the area is to be left as it is at this time. Thus the area to be modified probably does not contain more than 300 acres of Giant Sequoia Forest Type. There are roughly over 12,000 acres of this Type within the management responsibility of the National Park Service. If the National Park Service wishes to "prevent the alteration of the Sequoia environment," I believe that its first consideration should be this total area.

As a forester, with some 40 years experience in the management of Giant Sequoia lands, 13 years with the National Park Service and 29 years with the California Division of Forestry, I can say that, in my judgement, the past lack of proper management of these lands has done more to change the environment necessary for the perpetuation of the Giant Sequoia than has the use of a small area for recreational activities by the general public. It is my understanding that many of the National Park personnel, particularly the foresters, recognize this. The attempts to improve the Redwood Mountain area by the use of controlled fire is a beginning and is certainly commendable.

I believe that the National Park Service should be funded for this purpose. Having been a Park Ranger in the jast, I also know that this funding may be a long time in coming so I would hope that some provision for the total management of the Giant Sequoia areas could be added into any Management Plan for areas having this Type. It would then be possible to discuss this at the Public Hearings with the hope of generating public support for the needed work to perpetuate the Giant Sequoia Forest Type. It was the local public of Tulare and Fresno Counties who demanded and got the area set aside as a National Park in the 1890's. Under the present management, which encourages the encroachment of white fir into the area, has the ultimate result of preventing Giant Sequoia reproduction to replace the older trees and in a few centuries perhaps eliminate much of the Type. The Giant Sequoia seems to thrive on catastrophes such as timber harvesting, fire, road construction, etc. These elements open up the area to sunlight and provide a good soil seedbed. It is in these areas where we now find the most regeneration. (See the Big Stump area, Atwell Mill area, and the Mountain Home State Forest. Even the Converse Basin area is becoming restocked.)

It is, therefore, ZA'hope that all future Plans for any given area having a Giant Sequoia Forest Type, will have some funds included to bring the area back to a forest environment that is necessary for its perpetuation. After all, here we are dealing with the future centuries, not just a few decades.

As to the proposals in the Giant Forest Management Plan, I can agree that they are basically sound. I also realize that moving the buildings from the area will greatly benefit the Giant Sequoias, not particularly the large trees, but will provide an ideal soil and light condition for the establishment of new seedlings. Within 10 years following this action the area should show an excellent stand of young Sequoias.

I appreciate your problems and thank you for allowing me to make these comments.

Sincerely,

Dean F. Schlobohm Professional Forester

License #201.

cc: Lewis S. Eaton,
Member of the National Park Service
Advisory Committee.

# Response to Comments by Dean F. Schlobohm

1. Management of the forest is discussed in the Natural Resources Management Plan for Sequoia and Kings Canyon National Parks. The proposals in the Development Concept Plan are consistent with the Natural Resources Management Plan.

In general, the Fire Management Plan for the park includes a Natural Fire Management Zone (599,944 acres) and prescription burning outside of this area in remaining areas of the park. The Giant Forest-Lodgepole area will probably receive a combination of treatment methods including specific building site restoration and eventually prescribed burning once near natural conditions are achieved. A specific restoration program of the Giant Forest area will be developed prior to the removal of facilities.



3ret Taylor 1807 Michiga Bolse, Idaho 83706

David D. Thempson, Sr. Superintendent, Seguoia Kings Natal Park

Dear Sir,

Thank you for sending me the Draft Environmental Statement and the Draft Development Concept

Plan, I am very pleased and very much
in favor of the proposed Development Concept

Plan. The only alternative that comes close is

Alternative I - no action.

Tucerely, Out Tippe

As the nation's principal conservation agency, the Department of the Interior has basic responsibilities to protect and conserve our land and water, energy and minerals, fish and wildlife, and parks and recreation areas, and to ensure the wise use of all these resources. The department also has major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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